

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
)	
v.)	CRIMINAL NO. 19-cr-10459
)	
ROBERT AVITABLE.)	
)	
)	

**DEFENDANT’S ASSENTED TO MOTION FOR ADDITIONAL TIME TO POST
PROPERTIES AND SUBMIT DETAILED FINANCIAL AFFIDAVIT**

Now comes the Defendant who moves this Honorable Court for an additional week to post three properties, as condition of his continued release, and to submit a detailed affidavit describing his finances. As reason therefore, the Defendant states:

1. At the time of his release with conditions, the government identified three properties which it requested the defendant post in order to secure his release. However, the government subsequently determined that because it had already obtained an order restraining the defendant from selling or otherwise causing a lien on the identified properties, other properties would be needed as collateral.

2. On December 12, 2019, the Defendant agreed to use three different properties as collateral, and has since endeavored to obtain legal counsel to assist with the procedure.

3. The procedure includes preparation and recording of three mortgages, quitclaim deeds, and escrow agreements. Additional time is needed to complete the process.

4. Furthermore, counsel is in the process of preparing a detailed affidavit regarding the defendant’s current assets and income to determine his continued eligibility for court-

appointed counsel. The process is complicated by acquisitions which were a total loss within the last year, as well as the number of rental proprieties. Preparation of such a detailed affidavit, including review with an accountant, will take two additional weeks.

5. The government assents to the additional time.

Respectfully Submitted,

ROBERT AVITABLE

By his attorney,

/s/ Victoria Kelleher

Victoria Kelleher
1 Marina Park Drive
Suite 1410
Boston MA 02210

Date: December 17, 2019

Certificate of Service

I, Victoria Kelleher, attorney of record for the defendant, do hereby state that I have provided a copy of the Defendant's Motion to Continue on all the parties by efile this day.

Signed,

/s/ Victoria Kelleher

Victoria Kelleher